

UNITED STATES DISTRICT COURT
for the
Eastern District of North Carolina

FILED
JAN 31 2024
PETER A. MOORE, JR., CLERK
US DISTRICT COURT, EDNC
BY BC DEP CLK

In the Matter of the Search of)
(Briefly describe the property to be searched or identify the person by name and address))
Google Email Accounts, snapchatteam184@gmail.com,)
talentonemodeling@gmail.com, bdeddi11@gmail.com,)
and brantley.gurley@gmail.com, stored at 1600)
Amphitheatre Parkway, Mountain View, CA 9404.

Case No. 7:24-mj-1019-RJ

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):
Google, LLC., 1600 Amphitheatre Parkway, Mountain View, CA 94043, as specifically described in Attachment A.

located in the Northern District of California, there is now concealed (identify the person or describe the property to be seized):

Evidence of, instrumentalities used in committing, and fruits of the crimes pertaining to violations of 18 U.S.C. Section 2252A, as further described in Attachment B.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- evidence of a crime;
- contraband, fruits of crime, or other items illegally possessed;
- property designed for use, intended for use, or used in committing a crime;
- a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 2252A(a)(5)(B)	Possession of Child Pornography and/or Access with Intent to View a Visual Depiction of a Minor Engaged in Sexually Explicit Conduct; Production of Child Pornography; Online Enticement
18 U.S.C. § 2251(a)	
18 U.S.C. § 2422(b)	

The application is based on these facts:

See attached affidavit incorporated by reference herein

Continued on the attached sheet.

Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.


Applicant's signature

S/A Lauren Darden, Federal Bureau of Investigation
Printed name and title

On this day, the applicant appeared before me via reliable electronic means, that is by telephone, was placed under oath, and attested to the contents of this Application for a search warrant in accordance with the requirements of Fed. R. Crim. P. 4.1.

Date: January 31 2024


Judge's signature

Robert B. Jones, Jr., U.S. Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT

I, Lauren Darden, being duly sworn, hereby depose and state as follows:

INTRODUCTION

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been so employed since March 2019. I am an investigative or law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510(7). That is, I am an officer of the United States, who is empowered by law to conduct investigations of, and make arrests for, violations of federal law, including the offenses enumerated in 18 U.S.C. §§ 1591, 2251 and 2252, et seq.

2. I am currently assigned to the FBI’s Child Exploitation and Human Trafficking Task Force, Raleigh Resident Agency out of the Charlotte Division, which targets individuals involved in the online sexual exploitation of children. As part of my duties, I investigate crimes involving the sexual exploitation of minors, including sex trafficking, child pornography, and enticement violations. I have received training on the proper investigative techniques for these violations, including the use of surveillance techniques, undercover activities, and the application and execution of arrest and search warrants. I have conducted and assisted in child exploitation investigations and human trafficking investigations. Prior to my current assignment, I was assigned to the FBI Miami Division, where I was assigned to the violent crimes against children and human trafficking squad.

3. I make this affidavit in support of an application under Rule 41 of the Federal Rules of Criminal Procedure for a search warrant for the Google LLC email accounts specifically described in **Attachment A** of this Affidavit, including snapchatteam184@gmail.com (“TARGET

ACCOUNT 1”), talentonemodeling@gmail.com (“TARGET ACCOUNT 2”), bdeddi11@gmail.com (“TARGET ACCOUNT 3”), and brantley.gurley@gmail.com (“TARGET ACCOUNT 4”), collectively referred to as the “TARGET ACCOUNTS”. This information is stored at premises maintained, controlled, or operated by Google, an e-mail provider headquartered at 1600 Amphitheatre Parkway, Mountain View, California. Based on the facts set forth in this affidavit, there is probable cause to believe that violations of 18 U.S.C. § 2252A(a)(5)(B) and (b)(2) (possession of and access with intent to view a visual depiction of a minor engaged in sexually explicit conduct), 18 U.S.C. § 2251(a) (production of child pornography, including attempts to do so), and 18 U.S.C. § 2422(b) (online enticement, including attempts to do so), have been committed. There is also probable cause to search the information described in Attachment A for evidence of this crime as further described in Attachment B

4. The statements contained in this affidavit are based in part on information provided by U.S. federal law enforcement agents; written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents, including foreign law enforcement agencies; information gathered from the service of administrative subpoenas; the results of physical and electronic surveillance conducted by law enforcement agents; independent investigation and analysis by law enforcement agents/analysts and computer forensic professionals; and my experience, training, and background as a Special Agent. Since this Affidavit is being submitted for the limited purpose of securing a search warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that contraband and evidence, fruits, and instrumentalities of violations of 18 U.S.C. § 2252A(a)(5)(B) and (b)(2)

(possession of and access with intent to view a visual depiction of a minor engaged in sexually explicit conduct), 18 U.S.C. § 2251(a) (production of child pornography, including attempts to do so), and 18 U.S.C. § 2422(b) (online enticement, including attempts to do so), are contained within the TARGET ACCOUNTS.

BACKGROUND TO THE INVESTIGATION

5. In or around December of 2023, GURLEY was identified as an internet user attempting to gain access to a website dedicated to the distribution of child pornography. GURLEY was identified as the owner of a business, Country Gardens Florist, 106 E 2nd ST SB, Kenly, North Carolina (SUBJECT PREMISES).
6. On January 4, 2024, the U.S. District Court for Eastern District of North Carolina authorized a search warrant (5:24-mj-1029-RJ) for the SUBJECT PREMISES. On January 5, 2024, the search warrant was executed. During the execution of the search warrant by the FBI, GURLEY was at the SUBJECT PREMISES.
7. On January 5, 2024, Law Enforcement executed a federal search warrant at the SUBJECT PREMISES. The FBI collected multiple electronic devices, to include an HP Pavilion laptop, model number: 17-e020us, Serial Number: 5CD3227H2V; and took pictures of the interior of the business pursuant to the search warrant at the SUBJECT PREMISES. The forensic review of the electronic devices is ongoing, but an initial review revealed violations of 18 U.S.C. § 2252A.
8. An on-site preview of the laptop attributed to Gurley revealed possession of child pornography. Gurley possessed several images and videos containing what appeared to be child pornography, including the following media files:

- File name: “febfeb002-low” is a video approximately one minute long of two prepubescent children performing oral sex on an adult male. The male ejaculates on one child. The video contains a watermark “loliporn6s6cdjjo.onion”.
- File name: “Asd_34P(103)” is an image file of a prepubescent female lying on an adult male. The child is completely nude and touching her vagina. The adult male’s penis is touching the child’s body.
- File name: “9yo girl wash daddys dick, then gets fucked anal” is a video approximately two minutes and 26 seconds long, of a prepubescent female in a shower with an adult male. The child rubs soap on the adult male’s penis. After the shower, the video shows an adult male anally penetrating the prepubescent female.
- File name: “Asd_34P(99)” is an image file of a prepubescent female being vaginally penetrated by an adult male’s penis.
- File name: “Asd_34P (91)” is an image file of a completely nude prepubescent female lying down with an adult male’s penis touching near her vagina.

9. The electronic device had several windows open and viewable on the desktop. Numerous tabs contained dark web (.onion) linked information to include images depicting pubescent and prepubescent images of male and female children. There was also dark web child pornographic site information or links. Some of the links were as follows:

- Boy Land Online
- Boys Land 2
- Hebe + Teen Chat (stylized)
- I Love CP
- Loliboru

There were numerous tabs opened in browser windows which consisted of the following:

- Pedo Links
- Pedo Links
- Hebe + Teen Chat (stylized)
- VIDEO GALLERY: CP & adolescents – ILCP
- BoysLand -2
- Adele 12 Yo | PedoBum
- CP Boy Image Random – ILCP

There were also numerous applications open and running to include multiple Chrome sessions, Tor Network, multiple instances of 7Zip, VLC video player, and Windows Gallery viewer.

10. A review of the laptop attributed to Gurley also revealed he was using the TARGET ACCOUNTS. The forensic extraction of the Laptop was able to capture a portion of the Google Chrome Web History which revealed Gurley accessed the inbox of TARGET ACCOUNT 1 a number of times. It also appeared Gurley used TARGET ACCOUNT 1 to access TextNow or as a recovery email for TextNow. Browser History also indicated mail was sent from this TARGET ACCOUNT 1 from GURLEY's Laptop, in or around January 2024. A portion of the message titles located in the Chrome Browser History are outlined below:

- In or about April 2018: “Hacked Account Support”
- In or around May 2018: “Snapchat Password Reset”
- In or around February 2023: “Hacked Account Support”
- In or around November 2023: “Hacked Account Needs Your Response”, “Your Response is Still Needed”, and “Second Request Hacked Account Support”

Gurley had access to the inbox of TARGET ACCOUNT 2. It appeared he used TARGET ACCOUNT 2 as an Apple ID. TARGET ACCOUNT 2 was also used to access TextNow or as a recovery email for TextNow. TARGET ACCOUNT 2 was active on the computer when the search warrant was executed. Law Enforcement reviewed the computer on scene, and it appeared he was posing as a modeling agency to target girls, more specifically he asked for waist size and pictures. The Chrome Browser History revealed message titles “Talent One Modeling” and “Talent One Stat Report”. Browser History also indicated mail was sent from TARGET ACCOUNT 2 from that laptop in or around December of 2023.

TARGET ACCOUNT 3 was an account also accessed from the laptop and appeared to be used to access TextNow or as a recovery email for TextNow. TARGET ACCOUNT 4 is Gurley’s primary Gmail account and was also accessed from the laptop containing child pornography and dark web activity.

11. Gurley was interviewed during the execution of the search warrant at the SUBJECT PREMISES. After being advised of his rights and with his attorney present, Gurley provided the password to the laptop containing child pornography. Gurley indicated the type of content on the laptop would include child pornographic images and dark web activity. Gurley also admitted to posing as a fictitious modeling agency which was consistent with information found on the laptop. Gurley has a prior conviction for sexual exploitation of a minor and extortion. As a result of that conviction, GURLEY is a registered sex offender.

[Remainder of the page intentionally left blank]

CONCLUSION

59. Based on the foregoing, there is probable cause to believe that the federal criminal statutes cited herein have been violated, and that the contraband, property, evidence, fruits and instrumentalities of these offenses, more fully described in Attachment B, are located at the locations described in Attachment A. I respectfully request that this Court issue a search warrant for the locations described in Attachment A, authorizing the seizure and search of the items described in Attachment B.

Respectfully submitted,

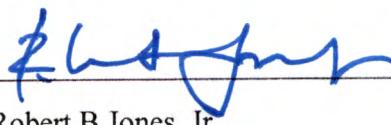


Lauren Darden

Special Agent

Federal Bureau of Investigation

Affidavit sworn to me as true and accurate by telephone consistent with Fed. R. Crim. P. 4.1 and 41(d)(3) on this 31 day of January, 2024.



Robert B. Jones, Jr.

United States Magistrate Judge

ATTACHMENT A

Property to Be Searched

This warrant applies to information associated with the Gmail accounts identified below that are stored at premises owned, maintained, controlled, or operated by Google, LLC, a company headquartered at 1600 Amphitheatre Parkway, Mountain View, California 94043:

12. TARGET ACCOUNT 1

Gmail account "snapchatteam184@gmail.com" (hereinafter, "TARGET ACCOUNT 1").

13. TARGET ACCOUNT 2

Gmail account "talentonemodeling@gmail.com" (hereinafter, "TARGET ACCOUNT 2").

14. TARGET ACCOUNT 3

Gmail account "bdeddi11@gmail.com" (hereinafter, "TARGET ACCOUNT 2").

15. TARGET ACCOUNT 4

Gmail account "brantley.gurley@gmail.com" (hereinafter, "TARGET ACCOUNT 2").

ATTACHMENT B

Particular Things to be Seized

I. Information to be disclosed by Google, LLC

To the extent that the information described in Attachment A is within the possession, custody, or control of Google, LLC, including any messages, records, files, logs, or information that have been deleted but are still available to Google, LLC, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Google, LLC is required to disclose the following information to the government for the TARGET ACCOUNTS listed in Attachment A, from July 12, 2021 through January 24, 2024:

1. The contents of all emails, SMS messages, MMS messages, and instant messages, including any attachment, associated with the TARGET ACCOUNTS, including stored or preserved copies of emails, SMS messages, MMS messages, and instant messages sent to and from the TARGET ACCOUNTS, draft emails, SMS messages, MMS messages, and instant messages, the source and destination addresses associated with each email, the date and time at which each email, SMS message, MMS message, and instant message was sent, and the size and length of each email, SMS message, MMS message, and instant message;
2. All records or other information regarding the identification of the TARGET ACCOUNTS, to include full name, physical address, telephone numbers and other

identifiers, records of session times and durations, the date on which the TAR GET ACCOUNTS were created, the length of service, the IP address used to register the TARGET ACCOUNTS, log-in IP addresses associated with session times and dates, account status, alternative e-mail addresses provided during registration, methods of connecting, log files, and means and source of payment (including any credit or bank account number);

3. The TARGET ACCOUNTS' information, user name, primary email address, secondary email address, connected applications and sites, and account activity, including account sign in locations, browser information, platform information, and internet protocol addresses;

4. Device(s) make, model and international Mobile Equipment Identifier ("IMEi") or Mobile Equipment Identifier ("MEID") of all associated devices linked to the TARGET ACCOUNTS;

5. All location data whether derived from Global Position System ("GPS") data, cell site/ cell tower triangulation / trilateration, precision measurement information such as timing advance or per call measurement data and Wi-Fi location;

6. All Web & App Activity including any and all Instagram and WhatsApp content, messages, and media contained within or associated with the TARGET ACCOUNTS;

7. The types of service utilized by the TARGET ACCOUNTS;
8. All records or other information stored at any time by an individual using the TARGET ACCOUNTS, including address books, contact and buddy lists, calendar data, pictures, and files;
9. All records pertaining to communications between Google and any person regarding the TARGET ACCOUNTS, including contacts with support services and records of actions taken;
10. All images, videos, and other digital files stored in the Google Drive and Google Photos accounts associated with the TARGET ACCOUNTS; and
11. All phone backups stored in or associated with the TARGET ACCOUNTS.

II. Information to be seized by the government

For any TARGET ACCOUNTS listed above in Attachment A whose seizure is otherwise authorized by this search warrant, from July 12, 2021 through January 24, 2024, the following may be seized by the government:

- a. evidence of who used, owned, or controlled the TARGET ACCOUNTS at the time the things described in this warrant were created, edited, or deleted, such as logs, registry entries, configuration files, saved usernames and passwords, documents, browsing history, user profiles, email, email contacts, "chat," instant messaging logs, photographs, and

correspondence;

- b. evidence indicating how and when the TARGET ACCOUNTS were accessed or used to determine the chronological context of TARGET ACCOUNTS' access, use, and events relating to crime under investigation and to the TARGET ACCOUNTS' user;
- c. evidence of the times the TARGET ACCOUNTS were used;
- d. passwords, encryption keys, and other access devices that may be necessary to access the TARGET ACCOUNTS;
- e. Device make, model and international Mobile Equipment Identifier ("IMEI") or Mobile Equipment Identifier ("MEID") of all associated devices linked to the TARGET ACCOUNTS;
- f. All location data whether derived from Global Position System ("GPS") data, cell site/ cell tower triangulation / trilateration, precision measurement information such as timing advance or per call measurement data and Wi-Fi location;
- g. Records of or information about the TARGET ACCOUNTS' usage, including caches, browser history and cookies, "bookmarked" or "favorite" web pages, search terms that the user entered into any Internet search engine, and records of user-typed web addresses;
- h. Communications, messages, images, videos, and/or any other data relating to child

exploitation;

1. Records, information, and items relating to child exploitation;
- J. Child pornography and child erotica;
- k. Records and information relating to the identity or location of the persons suspected of committing child exploitation;
- L. Records and information relating to child exploitation.